

REZONING REPORT

▶ **FILE #:** 3-H-26-RZ

AGENDA ITEM #: 27

AGENDA DATE: 3/5/2026

▶ **APPLICANT:** BENJAMIN C. MULLINS

OWNER(S): RBL, LLC

TAX ID NUMBER: 71 E C 001, 00101 (PARTIAL)

[View map on KGIS](#)

JURISDICTION: County Commission District 8

STREET ADDRESS: 6110 ASHEVILLE HWY (6114 ASHEVILLE HWY)

▶ **LOCATION:** South side of Asheville Hwy, east side of E Governor John Sevier Hwy

▶ **APPX. SIZE OF TRACT:** 8.9 acres

GROWTH POLICY PLAN: Urban Growth Area (Outside City Limits)

ACCESSIBILITY: Access is via Asheville Highway, a major arterial with a pavement width of 23 ft within a right-of-way which varies from 150 ft to 250 ft.

UTILITIES: Water Source: Knoxville Utilities Board

Sewer Source: Knoxville Utilities Board

FIRE DISTRICT: Rural Metro Fire

WATERSHED: Holston River and French Broad River

▶ **CURRENT ZONING:** CA (General Business), HZ (Historical Overlay)

▶ **REQUESTED ZONING:** CA (General Business)

▶ **EXISTING LAND USE:** Water, Commercial

▶
EXTENSION OF ZONING: No, this would not be an extension.

HISTORY OF ZONING: The subject property was rezoned from RB (General Residential) to CA (General Business), HZ (Historic Overlay) in 1993 (2-D-93-RZ).

SURROUNDING LAND USE AND ZONING: North: Agriculture/forestry/vacant land, commercial - PC (Planned Commercial)

South: Single family residential - RB (General Residential)

East: Rural residential, commercial - RB (General Residential), CA (General Business) in the County, C-H-2 (Highway Commercial) in the City

West: Water, commercial - F (Floodway), CA (General Business)

NEIGHBORHOOD CONTEXT: This area is comprised of single family dwellings and multifamily developments. An outdoor event center is located adjacent to the property and a large sports field development is planned directly to the north. There are commercial and office uses concentrated along Asheville Highway.

STAFF RECOMMENDATION:

▶ **Postpone the application 90 days to the June 11th, 2026 Planning Commission meeting to align with the recommendation of the Knox County Historic Zoning Commission.**

COMMENTS:

Background:

The Moses Armstrong house is a c.1805 Federal style brick farmhouse that is eligible for listing on the National Register of Historic Places for its architectural significance according to the Tennessee Historical Commission (see letter in Exhibit B). The house is one of the oldest extant structures in Knox County and has historical associations with settlement and transportation in the Holston River valley. The subject property was also home to the nearby Armstrong's/Ruggle's Ferry, which provided access across the river for over 100 years. The purpose of the request to reduce the HZ (Historic Zoning Overlay) is to allow for commercial development where the house is currently located (see Exhibit B for proposed site plan).

PURSUANT TO THE KNOX COUNTY ZONING ORDINANCE, ARTICLE 6.30.01, THE FOLLOWING CONDITIONS MUST BE MET FOR ALL REZONINGS (must meet all of these):

THE PROPOSED AMENDMENT SHALL BE NECESSARY BECAUSE OF SUBSTANTIALLY CHANGED OR CHANGING CONDITIONS IN THE AREA AND ZONES AFFECTED, OR IN THE COUNTY GENERALLY.

1. In January 2026, the Knox County Historic Zoning Commission (HZC) gave preliminary approval to the applicant to relocate the Moses Armstrong House to approximately 500 feet to the southeast of its current location, on the area where the HZ overlay would be retained. The HZC added conditions that require additional information regarding the moving plan and the site plan for the relocated structure to be provided to the Commission for review by May 2026, before the house would be relocated. This information has not yet been provided (see Exhibit B for the full HZC decision and extracts from the HZC case file).
2. Also at the January 2026 meeting, the HZC granted preliminary approval of the reduced HZ overlay with the condition that "final legislative approval of the rezoning should not be issued until the house is relocated." The house would lose the protection of the HZ overlay if it was removed prior to location, making it vulnerable to demolition. The completion of the house's relocation would constitute a changing condition that would support the proposed removal of the HZ overlay.
3. The River Breeze Event Center was opened on the subject property in 2024.

THE PROPOSED AMENDMENT SHALL BE CONSISTENT WITH THE INTENT AND PURPOSES OF THE APPLICABLE ZONING ORDINANCE.

1. The intent of the HZ overlay is to protect structures of historical and cultural significance in their present location or to provide for their relocation to a site with an overlay, and it requires that new construction, alteration, or use to be appropriate to the structure's character. The HZ overlay does not otherwise regulate land use. Demolition of buildings within HZ overlays requires HZC approval.
2. Reducing the HZ overlay prior to relocation would be inconsistent with the intent of the HZ overlay and the recommendations of the HZC. It would remove the protection for the historic house, leaving it vulnerable to demolition or detrimental alterations.
3. The property can be developed with any use permitted by its base CA (General Business) zoning under the current HZ overlay, which would require HZC approval of the design of new construction.

THE PROPOSED AMENDMENT SHALL NOT ADVERSELY AFFECT ANY OTHER PART OF THE COUNTY NOR SHALL ANY DIRECT OR INDIRECT ADVERSE EFFECTS RESULT FROM SUCH AN AMENDMENT.

1. Removing the HZ overlay from the historic Moses Armstrong House in its current location would make it vulnerable to demolition. Demolition would result in the irrevocable loss of a landmark that holds significant historic and cultural importance to Knox County.

PROPOSED AMENDMENT SHALL BE CONSISTENT WITH AND NOT IN CONFLICT WITH THE COMPREHENSIVE PLAN OF KNOX COUNTY, INCLUDING ANY OF ITS ELEMENTS, MAJOR ROAD PLAN, LAND USE PLAN, COMMUNITY FACILITIES PLAN, AND OTHERS:

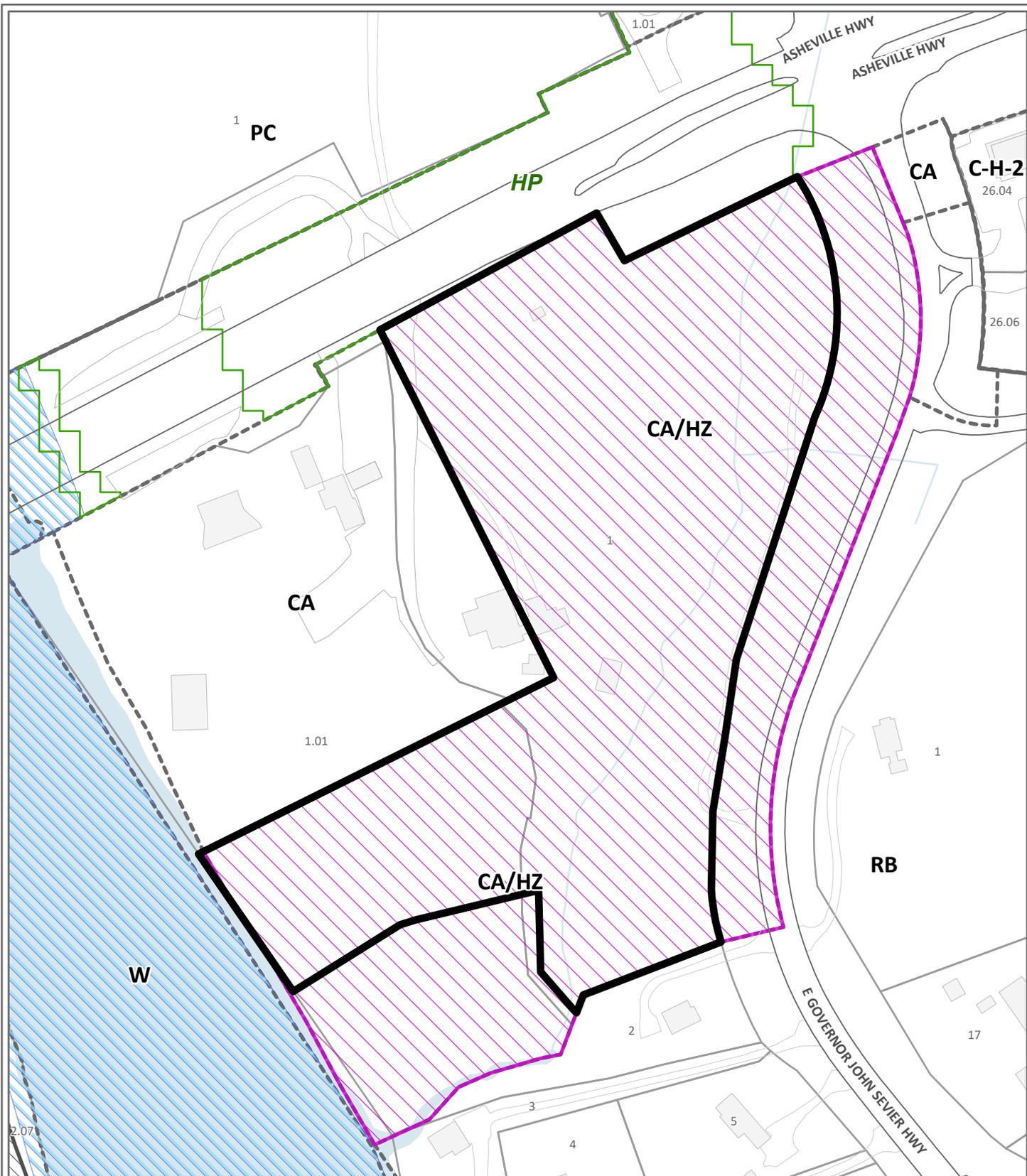
1. The reduction of the HZ overlay prior to the house's relocation does not align with policy 8 of the Comprehensive Plan, which encourages the conservation of historic and cultural resources.
2. The property's current CA zoning aligns with its CC (Corridor Commercial) future land use designation. The HZ overlay is appropriate within any future land use designation.

ESTIMATED TRAFFIC IMPACT: Not required.

ESTIMATED STUDENT YIELD: Not applicable.

If approved, this item will be forwarded to Knox County Commission for action on 4/20/2026. If denied, Knoxville-Knox County Planning Commission's action is final, unless the action to deny is appealed to Knox County Commission. The date of the appeal hearing will depend on when the appeal application is filed.

Appellants have 30 days to appeal a Planning Commission decision in the County.



REZONING

3-H-26-RZ

Petitioner: Benjamin C. Mullins



From: CA (General Business), HZ (Historical Overlay)

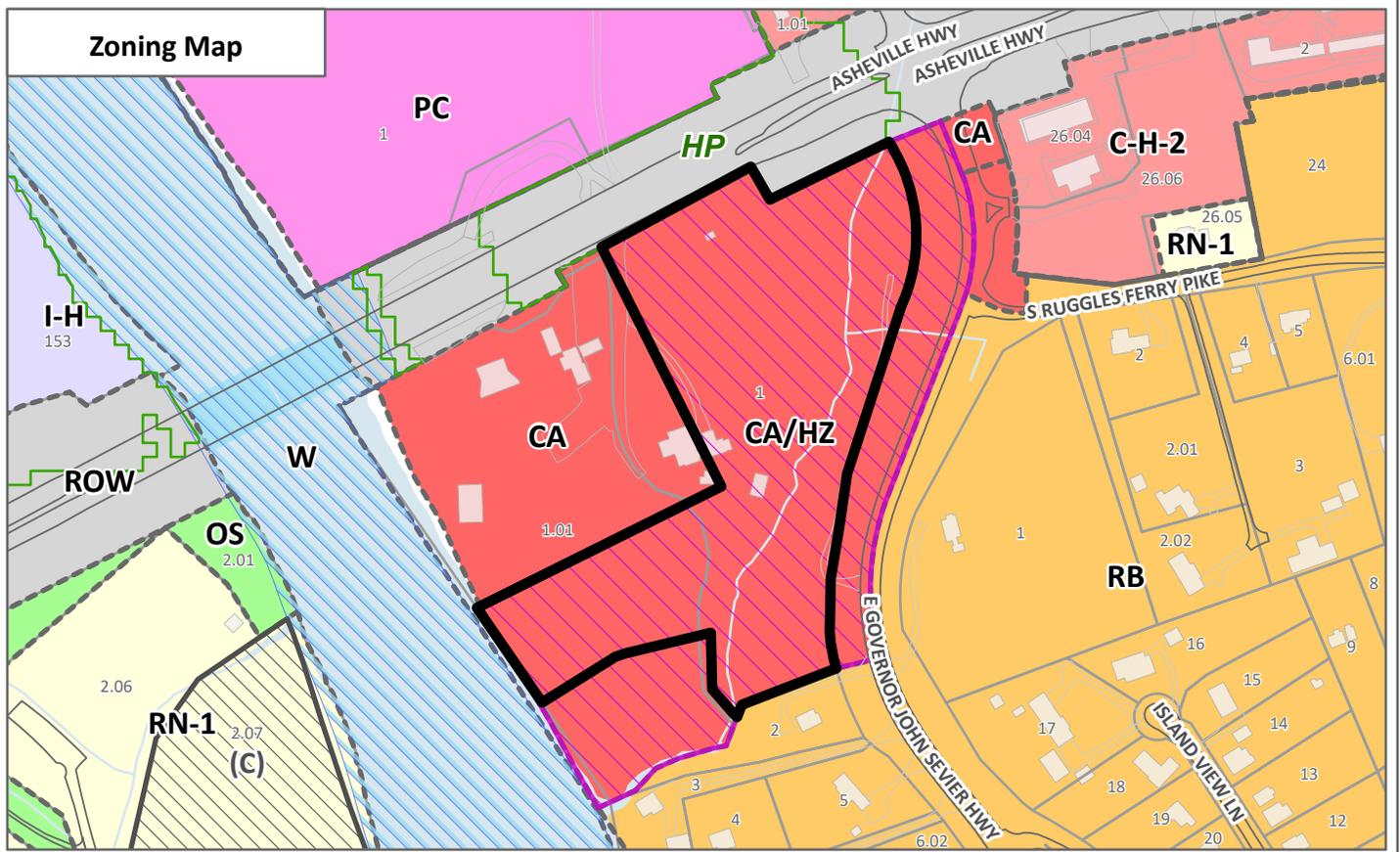
To: CA (General Business);HZ (Historical Overlay)

Map No: 71

Jurisdiction: County



Zoning Map



Comprehensive Plan Map

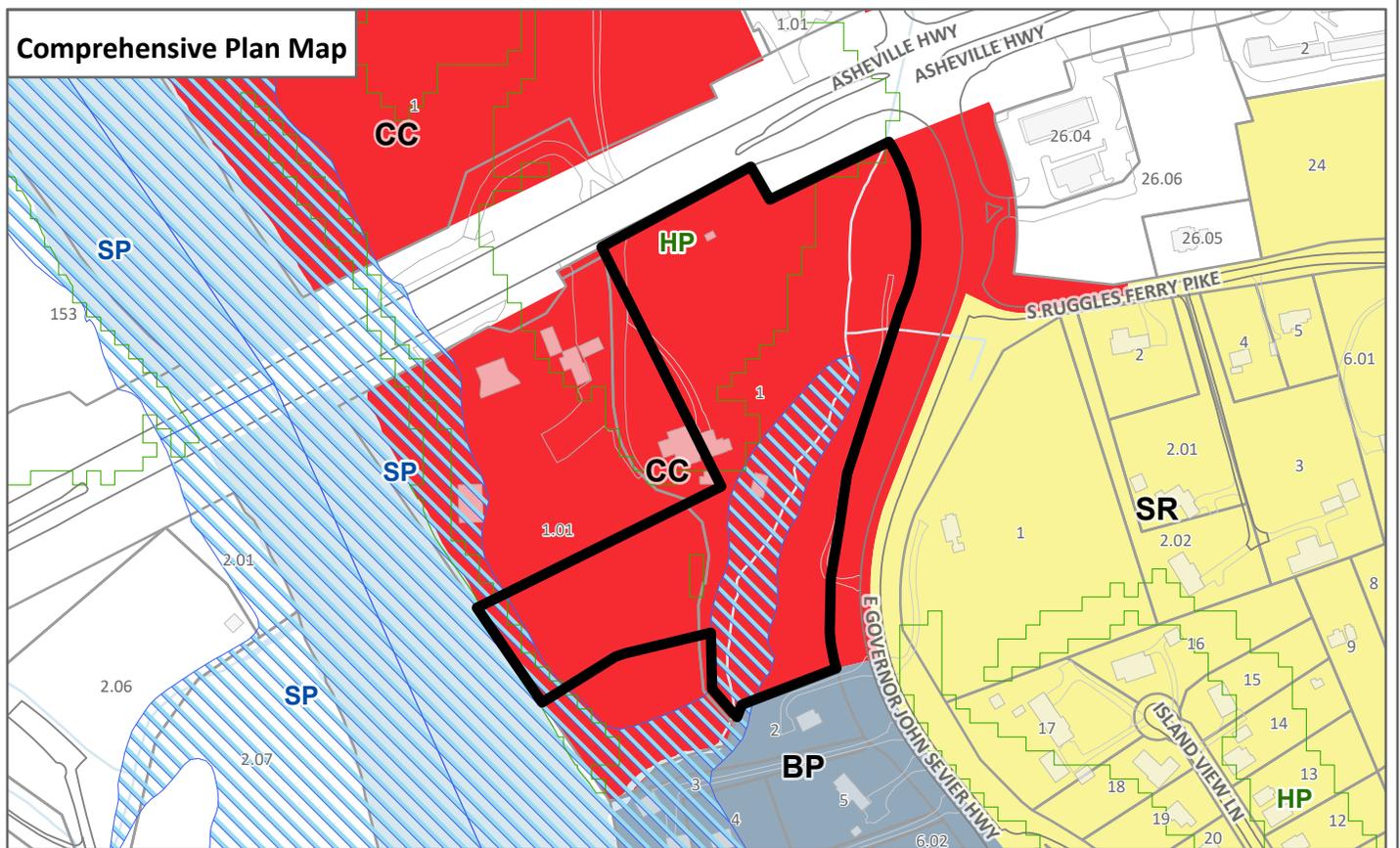
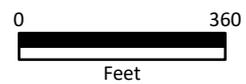


EXHIBIT A, CONTEXTUAL MAPS

3-H-26-RZ



Case boundary



Existing Land Use Map

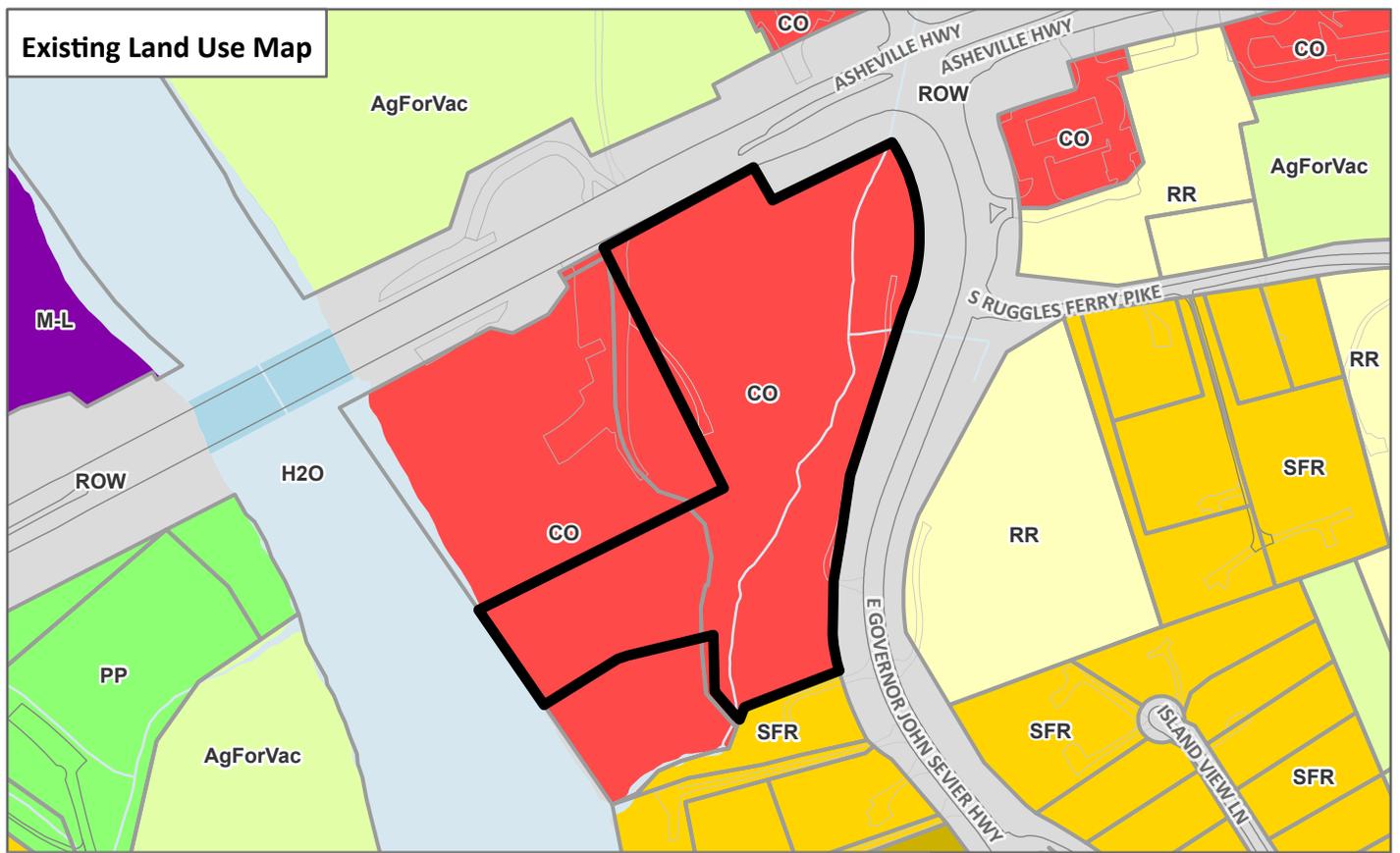


EXHIBIT A, CONTEXTUAL MAPS

3-H-26-RZ



Case boundary

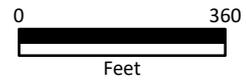
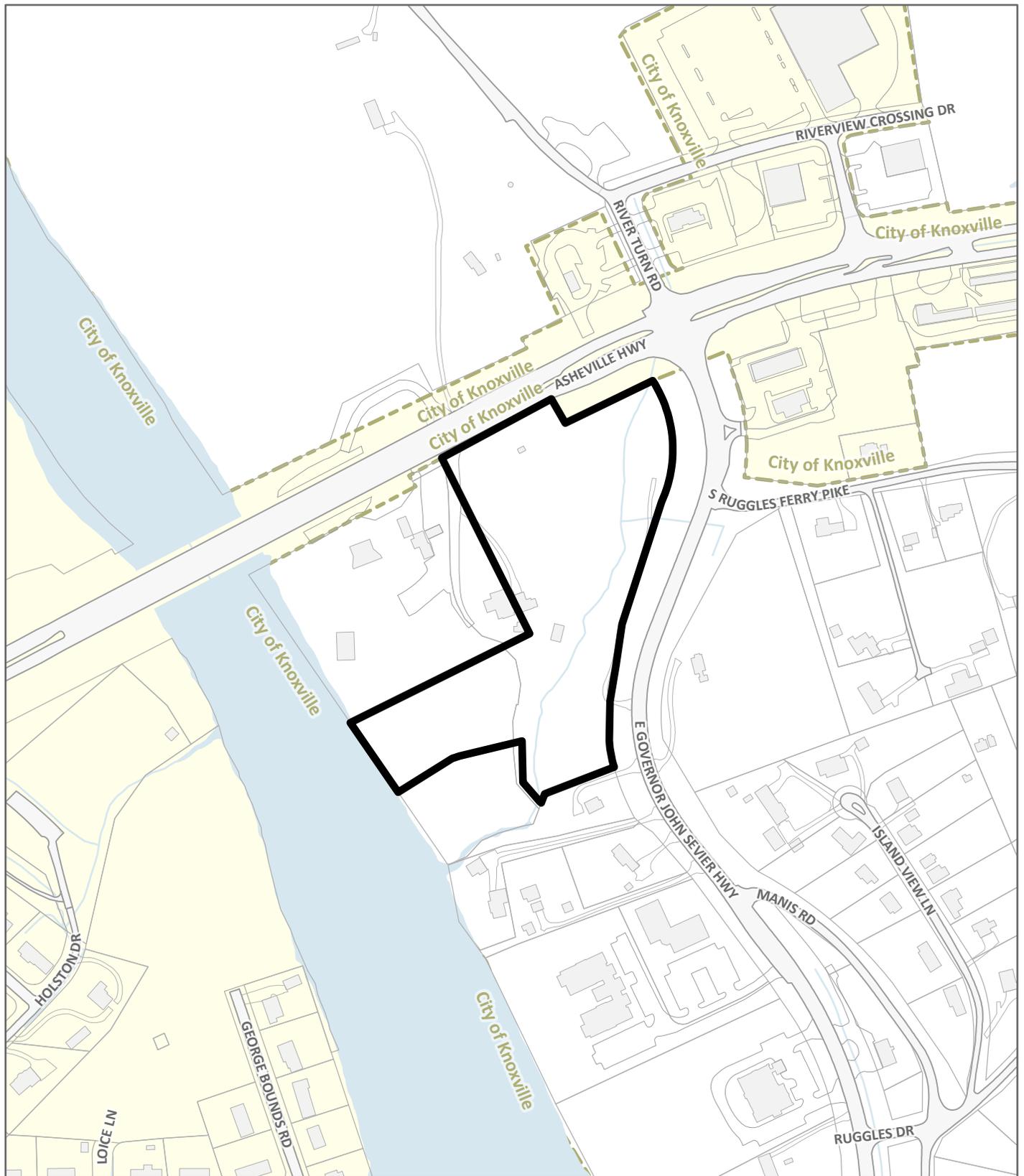


Exhibit A. Contextual Images



LOCATION MAP

3-H-26-RZ



Case boundary

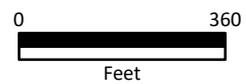


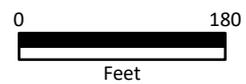
Exhibit A. Contextual Images



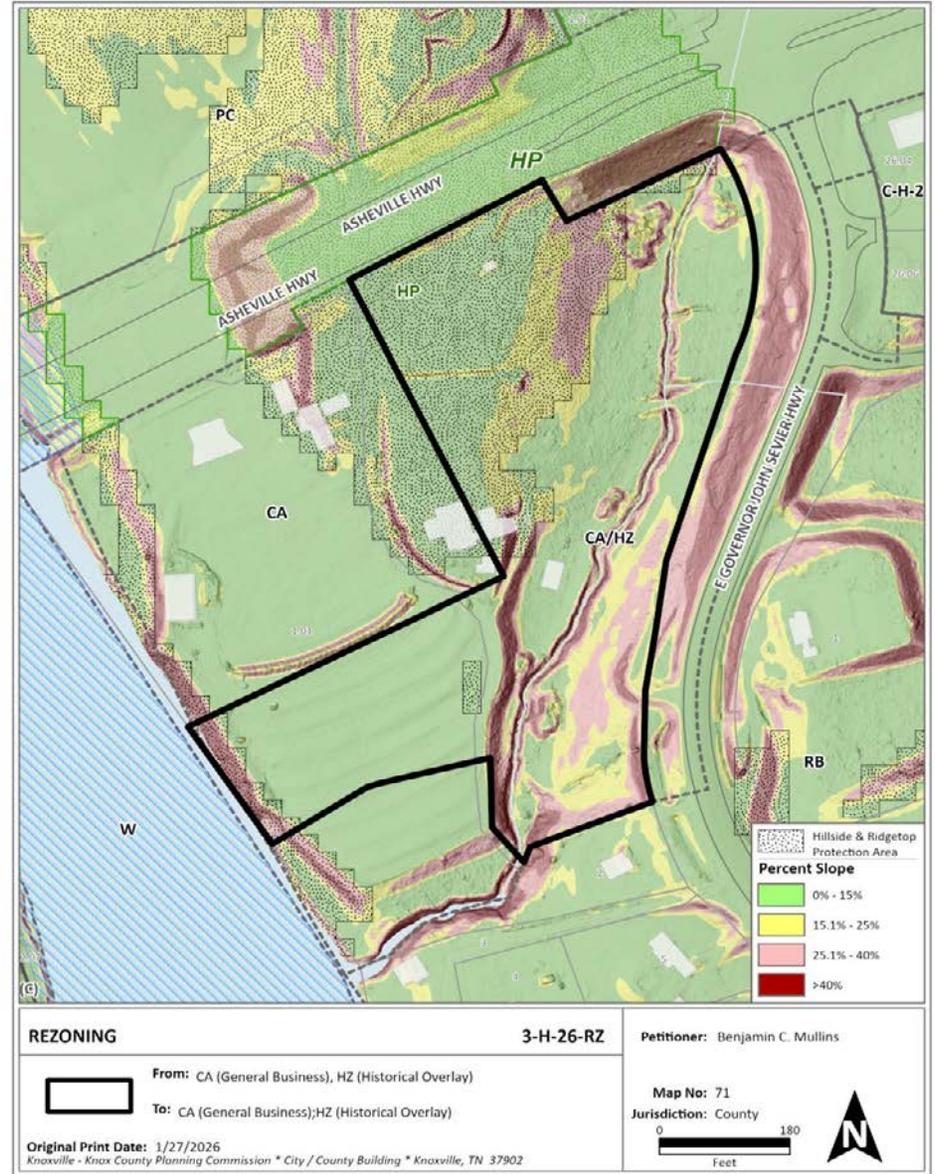
AERIAL MAP



Case boundary



CATEGORY	ACRES	RECOMMENDED DISTURBANCE BUDGET (Percent)	DISTURBANCE AREA (Acres)
Total Area of Site	8.90		
Non-Hillside	6.15	N/A	
0-15% Slope	1.46	100%	1.46
15-25% Slope	0.76	50%	0.38
25-40% Slope	0.39	20%	0.08
Greater than 40% Slope	0.14	10%	0.01
Ridgetops			
Hillside Protection (HP) Area	2.75	Recommended disturbance budget within HP Area (acres)	1.94
		Percent of HP Area	70.3%





Memorandum

TO: Knoxville-Knox County Planning Commission
FROM: Lindsay Lanois, AICP | Principal Planner
DATE: February 24, 2026
SUBJECT: Historic Zoning Commission action, 1-E-26-HZ

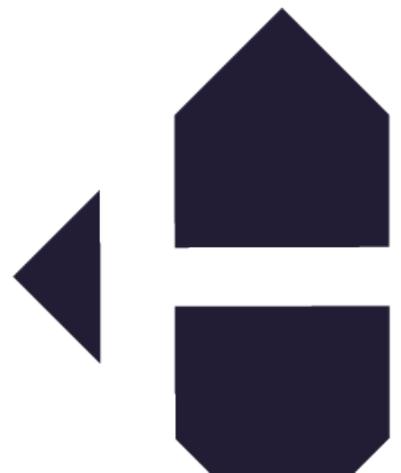
On January 15, 2026, the Knox County Historic Zoning Commission (HZC) reviewed a request to relocate the c.1805 Moses Armstrong House at 6114 Asheville Highway and reduce the historic zoning (HZ) overlay boundary. The HZC provided a preliminary approval of the relocation and the reduced HZ overlay, subject to the below conditions. The HZC requested the follow-up information be presented to the Commission within 120 days, or by the closest meeting (May 21, 2026). The [relevant case file](#) includes a staff report and supporting documentation.

Approval of the relocation was subject to the following conditions:

- a) detailed moving plan to be provided to the HZC for approval;
- b) retention or reconstruction of front porch addition, unless additional research is presented to the HZC defining a later date of construction OR a clear period of significance associated with the house's history and architecture;
- c) current and proposed floor plans and architectural elevations of the house, including foundation design and details, to be submitted to the HZC prior to relocation;
- d) landscaping plan, site design, and additional repair and rehabilitation/restoration scopes to be reviewed after the relocation.

Approval of the reduced HZ overlay was subject to the condition:

- a) final legislative approval of the rezoning should not be issued until the house is relocated.





TENNESSEE HISTORICAL COMMISSION
STATE HISTORIC PRESERVATION OFFICE
2941 LEBANON PIKE
NASHVILLE, TENNESSEE 37214
E-mail: Rebecca.Schmitt@tn.gov
(615) 818-4476

December 11, 2025

Dan Brown
browndan@bellsouth.net

Dear Mr. Brown:

Thank you very much for submitting information on the Robert Moses Armstrong House in Knoxville, Knox County. We understand the determination of eligibility has been requested as part of the planning process for its preservation. We appreciate the opportunity to provide advisory guidance on the property's eligibility.

National Register eligibility requires three elements: age (at least 50 years old); significance in history, design, or archaeology; and integrity, meaning that enough physical characteristics have been retained to convey why the property is important. Integrity is based on significance, meaning that different reasons for significance may require different elements of integrity to be intact.

After reviewing the information, we found that there was potential significance under Criterion A and Criterion C. Under Criterion A, the information indicates the Armstrong House was significant in local settlement history. The house was constructed ca. 1805 by early European American settler Robert Moses Armstrong who operated a nearby ferry. While the house appears to be important for these reasons, the house has experienced numerous changes since its original construction. The house has been expanded with multiple additions and has a prominent porch. Additionally, the setting of the house has changed drastically with a drive-in movie theater built in the 1950s. For these reasons, we have determined that the Armstrong House does not retain sufficient integrity to convey its significance in local settlement. Therefore, the Armstrong House is not eligible under Criterion A.

Under Criterion C, the Armstrong House is significant as an evolved house. Originally built in the Federal style, the house has been expanded and changed to suit the owners' new needs and style preferences. The house is a good example of this evolution within Knoxville's architectural context. Therefore, the Armstrong House is eligible under Criterion C.

There are many uncertainties about the additions and their construction dates. These ambiguities make it difficult to identify the best end for the property's period of significance. Any additions that are more than fifty years old and communicate the Armstrong House's architectural significance as an evolved property would be included in the Period of Significance. We recommend additional research into the history of the house and the additions to better understand

how the house has changed and evolved over time. This additional information will also be useful for making appropriate decisions regarding proposed work to the property moving forward.

We understand there have been discussions about moving the Armstrong house. Federal preservation guidance indicates that all efforts should be made to preserve a property at its original location. Moving a property should only be undertaken when all other efforts fail and moving is the only option to ensure its preservation. Moved properties are typically not eligible for listing in the National Register of Historic Places. If the property is moved, every effort should be made to reestablish its historic orientation, immediate setting, and general environment. If the property is moved, then eligibility must be reevaluated. Additional requirements known as Criteria Consideration B would apply in such cases. These requirements are often difficult to meet.

We hope this information is helpful as planning continues. If I can be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Schmitt". The signature is written in black ink and is positioned below the word "Sincerely,".

Rebecca Schmitt, Ph.D.
National Register of Historic Places Program Co-Coordinator

Moses Armstrong House: Staff Photos

Taken at 11/20/25 Workshop



Façade



Current Site



Victorian era front door with plaque stating "This historic American home was built in 1805"

Moses Armstrong House: Staff Photos

Taken at 11/20/25 Workshop



Façade and Left Elevation: original 1805 house, c.1830s rear ell addition, 20th century front porch



Top: Connection to 20th century garage from rear ell, brick damage



Below: Brick bond differences between rear ell and original house

Moses Armstrong House: Staff Photos

Taken at 11/20/25 Workshop



Façade view of 20th century side wing addition, entrance to side deck

Rear elevation: 20th century addition on interior of rear ell, rear view of side wing addition, wood shingles visible near partial cornice return, original gable window



Moses Armstrong House: Staff Photos

Taken at 11/20/25 Workshop



View of site of proposed relocation from rear deck



Existing site features of River Breeze Event Center



c. 1950s ticket booth and snack bar from previous River Breeze Drive-In

Moses Armstrong House: Staff Photos

Taken at 11/20/25 Workshop



c.1830s significant interior features: door and transom window, built-in cabinet in kitchen



c.1805 significant interior features: wood wainscoting, Federal mantel, built-in cabinets

Moses Armstrong House: Staff Photos

Taken at 11/20/25 Workshop



Historic interior windows from additions



Significant Victorian-era interior features: pocket doors and arched architrave, marble fireplace, central staircase



